

Albin Meli, et al.)	
)	
Plaintiff(s),)	
)	
v.)	Case No. <u>2:19-CV-71</u>
)	
City of Burlington, et al.)	
)	
Defendant(s).)	

1. In this case, discovery may be needed on the following subjects:
All claims and defenses raised in Plts.' Complaint and Defs.' Answer
_____.

Unless noted here to the contrary and in more detail, discovery in this matter shall not
be conducted in phases or limited to particular, enumerated issues.
2. The parties have conferred about disclosure, discovery, and preservation of
electronically stored information ("ESI"). Unless noted otherwise, ESI shall be
produced in the following format(s): native format or .pdf.
3. The parties have conferred about claims of privilege and claims of protection as
trial-preparation materials. The parties have agreed on the following procedure to
assert these claims after production: privilege log.

Unless specifically requested in a filing with this court, the parties agreed procedure
will not be the subject of a court order under Federal Rule of Evidence 502.
4. Any changes in the limitations on discovery imposed under the Federal Rules of Civil

Procedure or the Local Rules for this District shall be specifically described below.

DEADLINES

5. The parties shall serve initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) on or before 08/27/2019.
6. The parties shall serve all interrogatories and requests for production on or before 09/27/2019.
7. Depositions of all non-expert witnesses shall be completed by 12/01/2020.
8. Plaintiff shall submit expert witness reports on or before 09/01/2020.
Depositions of plaintiff's expert witnesses shall be completed by 10/01/2020.
9. Defendant shall submit expert witness reports on or before 11/01/2020.
Depositions of defendant's expert witnesses shall be completed by 12/01/2020.
10. The Early Neutral Evaluation session shall be conducted on 7/23/2020 at 09:00 ☒ am ☐ pm. The parties have agreed that Michael Marks will serve as the early neutral evaluator. (Note: Paragraph 10 only applies to ENE-eligible cases pursuant to Local Rule No. 16.1.)
11. The parties shall serve all requests for admission on or before 01/15/2021.
12. All discovery shall be completed by 02/01/2021 (no later than 8 months after filing of the Answer or Third-Party Answer).
13. Motions for joinder of parties and amendments to the pleadings shall be filed on or

09/01/2019

02/01/2021

03/01/2021

8/4/20 /s/ Evan Chadwick

Date _____

Counsel for Plaintiff(s)

8/4/20 /s/ Pietro J. Lynn

Date _____

Counsel for Defendant(s)

APPROVED and SO ORDERED:

/s/ William K. Sessions III

U.S. District/Magistrate Judge

Date: August 4, 2020

Local Form/Rule 26(a)(3)